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9
 10 **UNITED STATES DISTRICT COURT**
 11
 12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 PETER B. LAZARE, INDIVIDUALLY, AND
 17 AS TRUSTEE OF THE JON J. EDELMAN
 18 TRUST; IAN WILLIAMS, AS TRUSTEE OF
 19 THE AURORA BOREALIS TRUST; PREMIER
 20 TRUST, INC., AS TRUSTEE OF THE
 21 AURORA BOREALIS TRUST,

22 Defendants.

23 CASE NO. 2:14-cv-001075-APG-VCF

24 **STIPULATION AND ORDER TO FILE
 25 REPLIES TO RESPONSES TO MOTIONS
 26 FOR SUMMARY JUDGMENT AND
 27 RESPONSE TO COUNTERMOTION FOR
 28 SUMMARY JUDGMENT**

29 The parties filed Motions for Summary Judgment on May 13, 2015, and filed responses on
 30 June 12, 2015. The Edelman Trust's Taos, New Mexico property was scheduled to be sold
 31 pursuant to court order (*Acheff v Lazare*, Doc. 219) by the United States using an Internal Revenue
 32 Service Property Appraisal and Liquidation Specialist at a public auction sale on July 8, 2015.
 33 Any proceeds received by the United States will be credited to its \$1,601,000 constructive
 34 judgment against the Edelman Trust at issue in this case.

35 On June 24, 2015, the Court entered an Order (Doc. 45) approving the parties' stipulation
 36 to extend the date to file their respective replies from June 29, 2015 to July 31, 2015, after the sale
 37 date. On July 1, 2015, the Court entered an Order (Doc. 49) approving the parties' stipulation to
 38 extend the date for the Plaintiff to file a response to the Defendants' countermotion for summary
 39 judgment (Doc. 44) filed on June 12, 2016, from July 6, 2015, to July 31, 2015.

40 No bids were received at the public auction sale on July 8, 2015. Sale of the Edelman

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1 Trust's Taos, New Mexico property pursuant to court order (*Acheff v Lazare*, Doc. 219) by the
2 United States at a public auction sale was then re-scheduled to August 26, 2015. Therefore, on
3 July 24, 2015, the court approved the parties' stipulation to extend the date to file their respective
4 replies and response from July 31, 2015 until September 4, 2015, a date after the re-scheduled
5 public auction, and the Court so ordered. (Doc. 54)

6 No bids were received at the public auction sale on August 26, 2015, but Plaintiff and
7 Defendants have expressed interest in exploring settlement before engaging in further briefing.
8 Plaintiff United States of America ("Plaintiff"), and Defendants Peter B. Lazare, Individually, and
9 as Trustee of the Jon J. Edelman Trust, and Ian Williams, as Trustee of the Aurora Borealis Trust
10 ("Defendants"), therefore, stipulate to briefly extend the date to file their respective replies and
11 response from September 4, 2015, to September 11, 2015. Should settlement discussions

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1 prove fruitful and additional time be required to pursue settlement, the parties reserve the right to
2 seek a further extension from the court.

3 Dated: this 3rd day of September, 2015.

4 GARMAN TURNER GORDON LLP

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Dated: this 3rd day of September, 2015.

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